

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

ZACH HILLESHEIM,)	CASE NOS. 8:17-CV-00430
)	
Plaintiff,)	
)	ANSWER
v.)	
)	
KARTS, INC.,)	
)	
Defendant.)	

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2017 DEC -5 PM 1:48
OFFICE OF THE CLERK

COMES NOW the Defendant, by and through its attorney, Robert F. Peterson, and for its Answer to the Complaint of the Plaintiff states as follows:

1. Defendant is without knowledge to admit the allegations contained in paragraph 1 of the Plaintiff's Complaint and therefore denies same.
2. Defendant is without knowledge to admit the allegations contained in paragraph 2 of the Plaintiff's Complaint and therefore denies same.
3. Defendant is without knowledge to admit the allegations contained in paragraph 3 of the Plaintiff's Complaint and therefore denies same.
4. Defendant denies the allegations contained in paragraph 4 of the Plaintiff's Complaint.
5. Paragraph 5 of Plaintiff's Complaint requires no response and Defendant therefore denies same.
6. Defendant admits the allegations contained in paragraph 6 of the Plaintiff's Complaint.
7. Defendant admits the allegations contained in paragraph 7 of the Plaintiff's Complaint.
8. Defendant is without knowledge to admit the allegations contained in paragraph 8 of the Plaintiff's Complaint but believes the Plaintiff is a resident of Minnesota and therefore denies same.
9. Defendant is without knowledge to admit the allegations contained in paragraph 9 of the Plaintiff's Complaint and therefore denies same.
10. Defendant is without knowledge to admit the allegations contained in paragraph 10 of the Plaintiff's Complaint and therefore denies same.
11. Defendant admits the allegations contained in paragraph 11 of the Plaintiff's Complaint.

12. Defendant is without knowledge to admit the allegations contained in paragraph 12 of the Plaintiff's Complaint and therefore denies same.
13. Defendant is without knowledge to admit the allegations contained in paragraph 13 of the Plaintiff's Complaint and therefore denies same.
14. Defendant is without knowledge to admit the allegations contained in paragraph 14 of the Plaintiff's Complaint and therefore denies same.
15. Defendant is without knowledge to admit the allegations contained in paragraph 15 of the Plaintiff's Complaint and therefore denies same.
16. Defendant is without knowledge to admit the allegations contained in paragraph 16 of the Plaintiff's Complaint and therefore denies same.
17. Defendant is without knowledge to admit the allegations contained in paragraph 17 of the Plaintiff's Complaint and therefore denies same.
18. Defendant is without knowledge to admit the allegations contained in paragraph 18 of the Plaintiff's Complaint and therefore denies same.
19. Defendant admits the allegations contained in paragraph 19 of the Plaintiff's Complaint.
20. Defendant is without knowledge to admit the allegations contained in paragraph 20 of the Plaintiff's Complaint and therefore denies same.
21. Defendant is without knowledge to admit the allegations contained in paragraph 21 of the Plaintiff's Complaint but believes the Plaintiff resides in Minnesota and therefore denies same.
22. Defendant is without knowledge to admit the allegations contained in paragraph 22 of the Plaintiff's Complaint and therefore denies same.
23. Defendant is without knowledge to admit each and every allegation contained in paragraph 23 of the Plaintiff's Complaint and therefore denies same.
24. Defendant admits the allegations contained in paragraph 24 of the Plaintiff's Complaint.
25. Defendant admits the allegations contained in paragraph 25 of the Plaintiff's Complaint.
26. Defendant admits the allegations contained in paragraph 26 of the Plaintiff's Complaint.
27. Defendant admits the allegations contained in paragraph 27 of the Plaintiff's Complaint.
28. Defendant is without knowledge to admit the allegations contained in paragraph 28 of the Plaintiff's Complaint and therefore denies same.

29. Defendant is without knowledge to admit the allegations contained in paragraph 29 of the Plaintiff's Complaint and therefore denies same.
30. Defendant is without knowledge to admit the allegations contained in paragraph 30 of the Plaintiff's Complaint and therefore denies same.
31. Defendant is without knowledge to admit the allegations contained in paragraph 31 of the Plaintiff's Complaint and therefore denies same.
32. Defendant is without knowledge to admit the allegations contained in paragraph 32 of the Plaintiff's Complaint and therefore denies same.
33. Defendant admits the allegations contained in paragraph 33 of the Plaintiff's Complaint.
34. Defendant is without knowledge to admit each of the allegations contained in paragraph 34 of the Plaintiff's Complaint but has instituted an engineering review to determine the truth of the allegations but currently denies same.
35. Defendant admits the allegations contained in paragraph 35 of the Plaintiff's Complaint.
36. Defendant is without knowledge to admit the allegations contained in paragraph 36 of the Plaintiff's Complaint and therefore denies same.
37. Defendant is without knowledge to admit the allegations contained in paragraph 37 of the Plaintiff's Complaint and is having an engineering review of the Premises but currently denies same.
38. Defendant is without knowledge to admit the allegations contained in paragraph 38 of the Plaintiff's Complaint and is having an engineering review of the Premises but currently denies same.
39. Defendant is without knowledge to admit the allegations contained in paragraph 39 of the Plaintiff's Complaint and therefore denies same.
40. Defendant is without knowledge to admit the allegations contained in paragraph 40 of the Plaintiff's Complaint and therefore denies same.
41. Defendant incorporates each and every response set forth in paragraphs 1-40 above.
42. Defendant admits the allegations contained in paragraph 42 of the Plaintiff's Complaint.
43. Defendant admits the allegations contained in paragraph 43 of the Plaintiff's Complaint.
44. Defendant denies the allegations contained in paragraph 44 of the Plaintiff's Complaint.
45. Defendant denies the allegations contained in paragraph 45 of the Plaintiff's Complaint.

46. Defendant denies the allegations contained in paragraph 46 of the Plaintiff's Complaint.

47. Defendant is without knowledge to admit the allegations contained in paragraph 47 of the Plaintiff's Complaint and therefore denies same.

48. Defendant admits the allegations contained in paragraph 48 of the Plaintiff's Complaint.

49. Defendant is without knowledge to admit the allegations contained in paragraph 49 of the Plaintiff's Complaint and therefore denies same.

WHEREFORE, Defendant having fully answered the Complaint prays the Court dismiss this matter, with prejudice, and assess costs to the Plaintiff.

DATED this 5th day of December, 2017.

KARTS, INC., Defendant

By: /s/ Robert F. Peterson
Robert F. Peterson, #13303
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Attorney for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2017, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to counsel listed on the Court mailing list and to the following:

Padraigin L. Browne
Browne Law LLC
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Lake Elmo, MN 55042

By: /s/ Robert F. Peterson